

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE

CONFERENCE OF THE NAACP,

et al.,

Plaintiffs,

vs.

CASE NO.: 3:21-CV-03302-MBS-TJH-RMG

THOMAS C. ALEXANDER,

et al.,

Defendants.

VIDEOTAPED (Appearance via Video Conference)
DEPOSITION OF: PAULA BENSON
DATE: July 13, 2022
TIME: 10:04 a.m.
LOCATION: Robinson Gray
1310 Gadsden Street
Columbia, South Carolina
TAKEN BY: Counsel for the Plaintiffs
REPORTED BY: Mary K. Stepp, Court Reporter
(Appearance via Video Conference)

1 areas. And what -- what made it so important to keep
2 areas together, so that they could receive an
3 effective representation.

4 That has been the theme throughout our
5 process, throughout the public hearings that were
6 given, and at every step of the -- the process. The
7 public hearings have been placed on the website till
8 people were aware. There have been press releases
9 that have been sent out that have said this is the
10 information that we're gathering. There were
11 documents that are included on the website, which
12 explain to the public information being gathered
13 and -- and how to provide it to the subcommittee and
14 to the staff.

15 So throughout the process, there was ample
16 opportunity for anyone interested in being part of
17 the process to either call the staff, if they were
18 not sure how to proceed, and get further information
19 or to submit through the portal or to submit via an
20 e-mail. All of that was kept and maintained and --
21 and posted on the website.

22 Q. You testified about these guidelines a
23 number of times. And let me just ask you
24 specifically, does S-865, the congressional map, the
25 plan as passed, does it meet the criteria of these

1 guidelines?

2 A. It does.

3 Q. And not every specific example of every
4 line or every comment that might be made by someone
5 is not listed in those guidelines, correct?

6 A. No, no.

7 Q. And that doesn't change whether the
8 guidelines were complied?

9 A. No, it does not. And if there was
10 competing testimony that had to be taken into
11 consideration.

12 Q. Adriel asked you a question, and he said
13 if the staff never disclosed it to the public -- if
14 this was never disclosed to the public, how would the
15 public know. And I think you have an example on that
16 list of communities of interest where somebody
17 testified, let's keep the Sixth District the same,
18 right?

19 A. That's correct.

20 Q. So the public was on notice in a number of
21 ways, correct?

22 A. They were. And the group, like the NAACP
23 and the League of Women Voters, also put out videos
24 of their own for their groups, which told the public
25 where to seek information from our website and -- and

CERTIFICATE OF REPORTER

I, MARY K. STEPP, Notary Public for the State of South Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 29th day of July, 2022, at Campobello, Spartanburg County, South Carolina.



Mary K. Stepp, Notary Public

My Commission Expires:

March 1, 2028

1 Robert E. Tyson, Esq.

2 rtyson@robinsongray.com

3 July 29, 2022

4 RE: South Carolina Conference Of The NAACP v. Alexander, Thomas

5 7/13/2022, Paula Benson (#5318158)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 erratas-cs@veritext.com.

16
17 Return completed errata within 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21
22 Yours,

23 Veritext Legal Solutions
24
25

South Carolina Conference Of The NAACP v. Alexander, Thomas
Paula Benson (#5318158)

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REASON _____

Paula Benson

Date

1 South Carolina Conference Of The NAACP v. Alexander, Thomas
2 Paula Benson (#5318158)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Paula Benson, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10
11 _____
12 Paula Benson

Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

16
17
18 _____
19 NOTARY PUBLIC